

# Exhibit C

January 7, 2022

Mr. Richard A. Marshack, Esq.  
Marshack Hays LLP  
870 Roosevelt  
Irvine, CA 92620

**RE: United States v. Michael Avenatti**  
**19 Cr. 374 (JMF)**

Dear Mr. Marshack,

Federal Defenders of New York, Inc., represents the above captioned individual in federal court in the Southern District of New York. Attached please find a trial appearance subpoena for your testimony on January 24, 2022, at 40 Foley Square in front of Judge Jesse M. Furman at 9:00 a.m. and for the duration of the trial. In addition to your trial testimony, we are requesting items be **produced in advance** of the January 24, 2022, trial date. Please see the enclosed subpoena rider with the requested items.

The requested items should be returned to Federal Defenders of New York, Inc., Attn: Ms. Anna Finkel, 52 Duane St., 10<sup>th</sup> Fl., New York, NY, 10007 or by email to [anna\\_finkel@fd.org](mailto:anna_finkel@fd.org). You will not be required to be in court on January 24, 2022, but you will need to be available for the duration of the trial. Please contact me at (212) 417-8714 or Mr. Robert Baum, Esq. at (212) 417-8760 to discuss scheduling matters and your travel arrangements to testify at trial.

Sincerely,

/s/

Anna Finkel  
Chief Investigator  
(212) 417-8714

Enclosure

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America )

v. )

Michael Avenatti )

Case No. 19 Cr. 374 (JMF)

Defendant )

## SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Richard A. Marshack, Esq.

**YOU ARE COMMANDED** to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: 40 Foley Square, Judge Jesse M. Furman	Courtroom No.: courtroom 1105
	Date and Time: 01/24/2022 9:00 AM and for the duration of trial

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

SEE RIDER

(SEAL)

CLERK OF COURT

Date: 01/07/2022

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (*name of party*) Michael Avenatti  
\_\_\_\_\_, who requests this subpoena, are:

Federal Defenders of New York, Inc.  
Mr. Robert M. Baum, Esq.  
52 Duane St., 10th Fl.  
New York, NY 10007  
(212) 417-8760  
Robert\_Baum@fd.org

Case No. 19 Cr. 374 (JMF)

**PROOF OF SERVICE**

This subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
 tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

Richard A. Marshack – Rider

Provide the following records:

**\*\* Produce in advance of trial certified copies of the following items:**

provide any and all communications between Stephanie Clifford (aka Stormy Daniels) and Michael Avenatti between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all communications between Stephanie Clifford and Judy Regnier between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all communications involving Judy Regnier relating to Ms. Clifford's book between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all communications between Judy Regnier and Michael Avenatti relating to Stephanie Clifford between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all communications involving Michael Avenatti relating to work performed for Stephanie Clifford, including on her book deal, between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all documents reflecting work performed for Stephanie Clifford, including on her book deal, between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all accounting, billing, and financial records relating to Stephanie Clifford. This should include all invoices, bills, and accounting entries reflecting monies expended for Ms. Clifford, as well as all time spent working on Ms. Clifford's behalf.

- provide any and all Quickbooks and Tabs data relating to Ms. Clifford.

- provide any and all communications and documents relating to the financial condition of Michael Avenatti, Eagan Avenatti, LLP, and/or Avenatti and Associates, APC during the time period January 1, 2018 to March 30, 2019. This should include all documents and communications relating to assets, debts, cash flow, income, liabilities, loans, and prospects for future income.\*\*

\*\*The defendant is indigent and invokes Rule 17(b) F.R.CRIM. P, and as such is not responsible for records-related fees.\*\*

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America )

v. )

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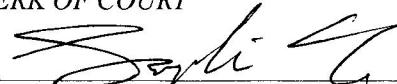
You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

SEE RIDER

(SEAL)

RUBY J. KRAJICK

CLERK OF COURT



Signature of Clerk or Deputy Clerk

Date: 01/07/2022

The name, address, e-mail, and telephone number of the attorney representing (*name of party*)  
\_\_\_\_\_, who requests this subpoena, are:

Michael Avenatti

Federal Defenders of New York, Inc.  
Mr. Robert M. Baum, Esq.  
52 Duane St., 10th Fl.  
New York, NY 10007  
(212) 417-8760  
Robert\_Baum@fd.org

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case (Page 2)

Case No. 19 Cr. 374 (JMF)

**PROOF OF SERVICE**

This subpoena for (name of individual and title, if any) Richard A Marshack  
 was received by me on (date) 1.9.2022

☒ I served the subpoena by delivering a copy to the named person as follows:

Chantal Arnold, Case Administrator @ Marshack & Hayes on (date) 1.10.2022 ; or  
@ 1:18 pm.

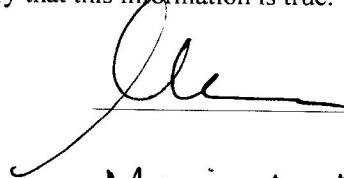
☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
 tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
 \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 1.10.2022



Server's signature

Marisela Barberena, paralegal

Printed name and title

P.O. Box 2007, Yorba Linda, CA 97885

Server's address

Additional information regarding attempted service, etc: